

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

**FRONT ROW TECHNOLOGIES, LLC,
Plaintiff,**

v.

**DALLAS COWBOYS FOOTBALL CLUB,
LTD.,
Defendant**

Civil Action No. 4:23-cv-00943

JURY TRIAL DEMANDED

PLAINTIFF’S ORIGINAL ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Front Row Technologies, LLC (“Front Row”) files this Original Complaint and demand for jury trial seeking relief from patent infringement of the claims of US Patent Number 8,750,784 (“the ‘784 patent”) (referred to as the “Patent-in-Suit”) by Dallas Cowboys Football Club, Ltd., (“Cowboys”).

I. THE PARTIES

1. Plaintiff Front Row is a LLC with its principal place of business located in Bernalillo County, NM.

2. On information and belief, Cowboys is a Limited Partnership existing under the laws of the State of Texas, with a regular and established place of business located at 1 ATT Way, Arlington, TX 76011. On information and belief, Cowboys sells and offers to sell products and services in this judicial district, and introduces products and services that perform infringing methods or processes into the stream of commerce knowing that they would be sold in Texas and

this judicial district. Cowboys may be served through its registered agent C T Corporation System, 1999 Bryan St, Ste. 900, Dallas, TX 75201-3136 or anywhere they may be found.

II. JURISDICTION AND VENUE

3. This Court has original subject-matter jurisdiction over the entire action pursuant to 28 U.S.C. §§ 1331 and 1338(a) because Plaintiff's claim arises under an Act of Congress relating to patents, namely, 35 U.S.C. § 271.

4. This Court has personal jurisdiction over Defendant because: (i) Defendant is present within or has minimum contacts within the State of Texas and this judicial district; (ii) Defendant has purposefully availed itself of the privileges of conducting business in the State of Texas and in this judicial district; and (iii) Plaintiff's cause of action arises directly from Defendant's business contacts and other activities in the State of Texas and in this judicial district.

5. Venue is proper in this district under 28 U.S.C. §§ 1391(b) and 1400(b). Defendant has committed acts of infringement and has a regular and established place of business in this District. Further, venue is proper because Defendant conducts substantial business in this forum, directly or through intermediaries, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct and/or deriving substantial revenue from goods and services provided to individuals in Texas and this District.

III. INFRINGEMENT

A. Infringement of the '784 Patent

6. On June 10, 2014, U.S. Patent No. 8,750,784 ("the '784 patent", included as Exhibit A) entitled "Method, System, and Server For Authorizing Computing Devices For The Receipt Of

Venue-Based Data Based On The Geographic Location Of The User” was duly and legally issued by the U.S. Patent and Trademark Office. Front Row owns the ‘784 patent by assignment.

7. The ‘784 patent relates to a novel and improved methods and systems for authorizing access by a user of a service associated with an event at a venue and provided via a computer network based on a determined geographic location of the user.

8. The Cowboys maintain, operate, and administer systems and methods that authorize access by a user of a service associated with an event at a venue and provided via a computer network based on a determined geographic location of the user that infringe one or more claims of the ‘784 patent, including one or more of claims 1 – 20 literally or under the doctrine of equivalents. Defendant put the inventions claimed by the ‘784 Patent into service (i.e., used them); but for Defendant’s actions, the claimed-inventions embodiments involving Defendant’s products and services would never have been put into service. Defendant’s acts complained of herein caused those claimed-invention embodiments as a whole to perform, and Defendant’s procurement of monetary and commercial benefit from it.

9. Support for the allegations of infringement may be found in the preliminary table attached as Exhibit B. These allegations of infringement are preliminary and are therefore subject to change.

10. The Cowboys have and continue to induce infringement. The Cowboys have actively encouraged or instructed others (e.g., its customers and/or the customers of its related companies), and continues to do so, on how to use its products and services (e.g., organizing unstructured data sets by priority) such as to cause infringement of one or more of claims 1 – 20 of the ‘784 patent, literally or under the doctrine of equivalents. Moreover, the Cowboys have known of the ‘784

patent and the technology underlying it from at least the filing date of the lawsuit.¹ For clarity, direct infringement is previously alleged in this complaint.

11. The Cowboys have and continue to contributorily infringe. The Cowboys have actively encouraged or instructed others (e.g., its customers and/or the customers of its related companies), and continues to do so, on how to use its products and services (e.g., organizing unstructured data sets by priority) and related services such as to cause infringement of one or more of claims 1- 20 of the '784 patent, literally or under the doctrine of equivalents. Further, there are no substantial noninfringing uses for Defendant's products and services. Moreover, the Cowboys have known of the '784 patent and the technology underlying it from at least the filing date of the lawsuit.² For clarity, direct infringement is previously alleged in this complaint.

12. The Cowboys have caused and will continue to cause Front Row damage by direct and indirect infringement of (including inducing infringement of) the claims of the '784 patent.

IV. JURY DEMAND

Front Row hereby requests a trial by jury on issues so triable by right.

V. PRAYER FOR RELIEF

WHEREFORE, Front Row prays for relief as follows:

- a. enter judgment that Defendant has infringed the claims of the '784 patent;
- b. award Front Row damages in an amount sufficient to compensate it for Defendant's infringement of the '784 patent in an amount no less than a reasonable royalty or lost profits, together with pre-judgment and post-judgment interest and costs under 35 U.S.C. § 284;

¹ Plaintiff reserves the right to amend if discovery reveals an earlier date of knowledge.

² Plaintiff reserves the right to amend if discovery reveals an earlier date of knowledge.

- c. award Front Row an accounting for acts of infringement not presented at trial and an award by the Court of additional damage for any such acts of infringement;
- d. declare this case to be “exceptional” under 35 U.S.C. § 285 and award Front Row its attorneys’ fees, expenses, and costs incurred in this action;
- e. declare Defendant’s infringement to be willful and treble the damages, including attorneys’ fees, expenses, and costs incurred in this action and an increase in the damage award pursuant to 35 U.S.C. § 284;
- f. a decree addressing future infringement that either (i) awards a permanent injunction enjoining Defendant and its agents, servants, employees, affiliates, divisions, and subsidiaries, and those in association with Defendant from infringing the claims of the Patents-in-Suit, or (ii) awards damages for future infringement in lieu of an injunction in an amount consistent with the fact that for future infringement the Defendant will be an adjudicated infringer of a valid patent, and trebles that amount in view of the fact that the future infringement will be willful as a matter of law; and
- g. award Front Row such other and further relief as this Court deems just and proper.

Respectfully submitted,

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